IN THE UNITED STATES BANKRUPTCY COURT FOR THE SOUTHERN DISTRICT OF MISSISSIPPI

IN RE: Larry Rapheal Washington Case No. 21-00368-KMS
Shameke Shantae Washington, Debtors CHAPTER 13

NOTICE

Debtors have filed papers with the court to Modify their Chapter 13 Bankruptcy Plan.

<u>Your rights may be affected.</u> You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)

If you do not want the court to amend the Plan, or if you want the court to consider your views on the Motion, then on or before 30 days, you or your attorney must:

File with the court a written request for a hearing at:

U.S. Bankruptcy Clerk U.S. Bankruptcy Court Thad Cochran United States Courthouse 501 E. Court St., Ste 2.300 Jackson, MS 39201

If you mail your request to the court for filing, you must mail it early enough so the court will **receive** it on or before the date state above.

You must also mail a copy to the debtors' attorney:

The Rollins Law Firm, PLLC P.O. Box 13767 Jackson, MS 39236 (601) 500-5533

If you or your attorney do not take these steps, the court may decide that you do not oppose the relief sought in the motion and may enter an order granting that relief, which shall sustain this Motion to Modify Plan.

Date: July 30, 2025 Signature: /s/ Thomas C. Rollins, Jr.

Thomas C. Rollins, Jr. (MSBN 103469) Jennifer Ann Curry Calvillo (MSBN 104367)

The Rollins Law Firm, PLLC

P.O. Box 13767 Jackson, MS 39236

IN THE UNITED STATES BANKRUPTCY COURT FOR THE SOUTHERN DISTRICT OF MISSISSIPPI

IN RE: Larry Rapheal Washington Shameke Shantae Washington, Debtors

Case No. 21-00368-KMS CHAPTER 13

MOTION TO MODIFY BANKRUPTCY PLAN

COME NOW, Debtors, by and through counsel, and move this Court to modify their Chapter 13 plan, and in support thereof, would show the Court as follows:

- 1. Debtors commenced this case on March 5, 2021 by filing a voluntary petition for relief under Chapter 13 of Title 11 of the United States Bankruptcy Code.
- 2. Debtors' priority and secured claims have been paid in full pursuant to the terms of the confirmed plan.
- 3. That the Trustee filed a Motion to Modify to increase the distribution to unsecured creditors.
- 4. That Debtor is a below-median debtor.
- 5. That Debtor wishes to modify the confirmed plan to shorten the term upon the completion of the distributions to secured, priority, and allowed unsecured creditors, in accordance with the confirmed plan.

WHEREFORE, Debtors pray that their Bankruptcy Plan be modified to reflect the abovementioned changes and for such additional or alternative relief as may be just and proper.

Respectfully submitted

/s/ Thomas C. Rollins, Jr.
Thomas C. Rollins, Jr. (MS Bar No. 103469)

Of Counsel: Thomas C. Rollins, Jr. Jennifer Ann Curry Calvillo The Rollins Law Firm, PLLC P.O Box 13767 Jackson, MS 39236 601-500-5533

CERTIFICATE OF SERVICE

I, Thomas C. Rollins, Jr., do hereby certify that a true and correct copy of the above and foregoing Notice and Motion to Modify Plan was forwarded on July 30, 2025, to:

By Electronic CM/ECF Notice:

David Rawlings

U.S. Trustee

/s/ Thomas C. Rollins, Jr.
Thomas C. Rollins, Jr.

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| 4 | UNITED STATES BANKRUPTCY COURT |
| 5 | SOUTHERN DISTRICT OF MISSISSIPPI |
| 6 | IN RE: CASE NO: 21-00368 LARRY RAPHEAL WASHINGTON DECLARATION OF MAILING |
| 7 | SHAMEKE SHANTAE WASHINGTON CERTIFICATE OF SERVICE |
| 8 | Chapter: 13 |
| 9 | |
| 10 | |
| 11 | On 7/30/2025, I did cause a copy of the following documents, described below, |
| 12 | Notice and Motion to Modify Plan |
| 13 | |
| 14 | |
| 15 | |
| 16 | |
| 17 | |
| 18 | to be served for delivery by the United States Postal Service, via First Class United States Mail, postage prepaid, with |
| 19 | sufficient postage thereon to the parties listed on the mailing list exhibit, a copy of which is attached hereto and incorporated as if fully set forth herein. |
| 20 | I caused these documents to be served by utilizing the services of BK Attorney Services, LLC d/b/a certificateofservice. com, an Approved Bankruptcy Notice Provider authorized by the United States Courts Administrative Office, pursuant to |
| 21 | Fed.R.Bankr.P. 9001(9) and 2002(g)(4). A copy of the declaration of service is attached hereto and incorporated as if fully set forth herein. |
| 22 | Parties who are participants in the Courts Electronic Noticing System ("NEF"), if any, were denoted as having been |
| 23 | served electronically with the documents described herein per the ECF/PACER system. DATED: 7/30/2025 |
| 24 | <u>/s/ Thomas C. Rollins, Jr.</u> Thomas C. Rollins, Jr. |
| 25 | The Rollins Law Firm |
| 26 | 702 West Pine St Hattiesburg, MS 39401 |
| 27 | 601 500 5533 trollins@therollinsfirm.com |
| 28 | |

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21-00368-KMS Dkt 42 Filed 07/30/25 Entered 07/30/25 10:25:34 Page 5 of 7 2 3 UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF MISSISSIPPI 5 IN RE: CASE NO: 21-00368 6 **CERTIFICATE OF SERVICE** LARRY RAPHEAL WASHINGTON SHAMEKE SHANTAE WASHINGTON **DECLARATION OF MAILING** Chapter: 13 8 9 10 On 7/30/2025, a copy of the following documents, described below, Notice and Motion to Modify Plan 12 13 14 15 16 18 were deposited for delivery by the United States Postal Service, via First Class United States Mail, postage prepaid, with sufficient 19 postage thereon to the parties listed on the mailing list exhibit, a copy of which is attached hereto and incorporated as if fully set forth 20 The undersigned does hereby declare under penalty of perjury of the laws of the United States that I have served the above 21 referenced document(s) on the mailing list attached hereto in the manner shown and prepared the Declaration of Certificate of Service and that it is true and correct to the best of my knowledge, information, and belief. 22 DATED: 7/30/2025 23 24 25 Miles Wood BK Attorney Services, LLC 26 d/b/a certificateofservice.com, for Thomas C. Rollins, Jr. The Rollins Law Firm 702 West Pine St 28 Hattiesburg, MS 39401

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USPS FIRST CLASS MAILING RECIPIENTS: Parties with names struck through or labeled CM/ECF SERVICE were not served via First Class USPS Mail Service.

NCRS ADDRESS DOWNLOAD CASE 21-00368 SOUTHERN DISTRICT OF MISSISSIPPI WED JUL 30 8-2-10 PST 2025

LABEL MATRIX FOR LOCAL NOTICING FORD MOTOR CREDIT COMPANY LLC

NCRS ADDRESS DOWNLOAD CO OLIVIA SPENCER ESQ 4515 N SANTA FE AVE DEPT APS

CASE 21-00368 1855 CRANE RIDGE DRIVE SUITE D OKLAHOMA CITY OK 73118-7901 JACKSON MS 39216-4944

FORD MOTOR CREDIT COMPANY LLC CO AIS 4515 N SANTA FE AVE DEPT APS OKLAHOMA CITY OK 73118-7901

US BANKRUPTCY COURT THAD COCHRAN US COURTHOUSE 501 E COURT STREET JACKSON MS 39201-5036

BKBROOKHAVEN 411 BROOKWAY BLVD BROOKHAVEN MS 39601-3243

BROOKHAVEN ANIM 1210 US51 BROOKHAVEN MS 39601 BROOKHAVEN RADIOLOGY PLLC CSPIRE WIRELESS
CO FRANKLIN COLLECTION SERVICE PO BOX 159
PO BOX 3910 MEADVILLE MS 39653-0159 PO BOX 3910 TUPELO MS 38803-3910

(P) CENTERPOINT ENERGY PO BOX 1700 HOUSTON TX 77251-1700 CLAYTON H JOHNSTON DMD 224 S CHURCH ST A BROOKHAVEN MS 39601-3232 COMMUNITY CHOICE F 396 BROOKHAVEN ST BROOKHAVEN MS 39601-3639

EDUCATIONAL CREDIT MANAGEMENT CORPORATION (E ECMC PO BOX 16408 ST PAUL MN 55116-0408

FIRST TOWER LOAN LLC PO BOX 320001 FLOWOOD MS 39232-0001

(P) FORD MOTOR CREDIT COMPANY P O BOX 62180 COLORADO SPRINGS CO 80962-2180

FORD MOTOR CREDIT POB 542000 OMAHA NE 68154-8000

FORD MOTOR CREDIT CO LLC PAT HENLEY PO BOX 389 JACKSON MS 39205-0389

4515 N SANTA FE AVE DEPT APS OKLAHOMA CITY OK 73118-7901

EXCLUDE

FRANKLIN COLLECTION 2978 W JACKSON ST TUPELO MS 38801-6731

JENNIFER ANN CURRY CALVILLO
THE ROLLINS LAW FIRM PLLC ON BEHALF OF THE DEBTORS
702 WEST PINE ST HATTIESBURG MS 39401-3836

KINGS DAUGHTER MEDICA PO BOX 5440 BROOKHAVEN MS 39603-5440

NATIONAL CREDIT ADJ PO BOX 550 HUTCHINSON KS 67504-0550

NAVIENT PO BOX 9500 WILKES BARRE PA 18773-9500 NAVIENT SOLUTIONS LLC ON BEHALF OF ASCENDIUM EDUCATION SOLUTIONS INC PO BOX 8961 MADISON WI 53708-8961

OLIVIA SPENCER KING SPENCER PLLC
FOR FORD MOTOR CREDIT COMPANY LLC 1855 CRANE RIDGE DRIVE SUITE D JACKSON MS 39216-4944

OUICK CASH 825 W NORTHSIDE DR JACKSON MS 39206-4508

SANTANDER CONSUMER USA INC 1601 ELM ST STE 800 DALLAS TX 75201-7260

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Parties with names struck through or labeled CM/ECF SERVICE were not served via First Class USPS Mail Service.

EXCLUDE

(P) TOWER LOAN
P O BOX 320001
FLOWOOD MS 39232-0001

UNITED STATES TRUSTEE
501 EAST COURT STREET
SUITE 6-430
JACKSON MS 39201-5022

WORLD FINANCE PO BOX 6429 GREENVILLE SC 29606-6429

EXCLUDE

WORLD FINANCE
WORLD ACCEPTANCE CORP ATTN BANKRUPTCY
PO BOX 6429
GREENVILLE SC 29606-6429

(P) DAVID RAWLINGS
ATTN DAVID RAWLINGS CHAPTER 13 TRUSTEE
PO BOX 566
HATTIESBURG MS 39403 0566

JENNIFER A CURRY CALVILLO THE ROLLINS LAW FIRM 702 W PINE ST HATTIESBURG MS 39401-3836

DEBTOR

LARRY RAPHEAL WASHINGTON 624 E CHICKASAW ST BROOKHAVEN MS 39601-3420

SHAMEKE SHANTAE WASHINGTON 624 E CHICKASAW ST BROOKHAVEN MS 39601-3420 EXCLUDE

THOMAS CARL ROLLINS JR
THE ROLLINS LAW FIRM PLLC
PO BOX 13767
JACKSON MS 39236 3767